

From: [Sue Walde](#)
To: [Scoping_Delta Plan@Delta Council](#)
Cc: [Tom Williams](#)
Subject: RD830 Response to Notice of Preparation, Draft Environmental Impact Report for the Delta Plan
Date: Thursday, February 03, 2011 10:37:07 AM
Attachments: [ironhousesd@isd.us.com_20110202_222112.pdf](#)

Ms. Macaulay,

It is my intent to bring to your attention that the attached letter dated 1/28/2011 was accidentally printed on Ironhouse Sanitary District letterhead instead of Reclamation District 830 letterhead. In your review of this letter, I wanted to bring to your attention and ask your consideration that the comments represent Reclamation District 830 (RD830).

Thank you for your consideration in correcting this item.

Regards,

Susan V. Walde
District Secretary
Ironhouse Sanitary District
450 Walnut Meadows Drive
Oakley, CA 94561
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walde@isd.us.com

-----Original Message-----

From: ironhousesd@isd.us.com [<mailto:ironhousesd@isd.us.com>] On Behalf Of ironhousesd@
Sent: Wednesday, February 02, 2011 7:21 PM
To: Sue Walde
Subject: Scanned image from MX-3100N

Reply to: ironhousesd@isd.us.com <ironhousesd@isd.us.com>
Device Name: Not Set
Device Model: MX-3100N
Location: Not Set

File Format: PDF MMR(G4)
Resolution: 300dpi x 300dpi

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IRONHOUSE SANITARY DISTRICT

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Telephone
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January 28, 2011

VIA: U. S. Mail and E-mail
Ms. Terry Macaulay
Delta Stewardship Council
980 Ninth Street, Suite 1500 31
Sacramento, CA 95814 32
deltaplanscoping@deltacouncil.ca.gov

RE: Response to Notice of Preparation, Draft Environmental Impact
Report for the Delta Plan

Dear Ms. Macaulay:

Thank you for sending Reclamation District 830 ("RD 830") the Notice of Preparation for the Draft Environmental Impact Report ("DEIR") for the Delta Plan. In accordance with Attachment 1 of the NOP, RD 830 is both a "responsible" and a "trustee" agency under the California Environmental Quality Act (CEQA) with respect to the development of the Delta Plan Environmental Impact Report ("EIR"). RD 830 is pleased to submit the following comments in response to the NOP, but first this letter presents background information on RD 830.

Background

RD 830 was created by a special act of the State Legislature approved on March 11, 1911 (Statutes 1911:342). RD 830 owns, operates and maintains the reclamation works on Jersey Island which encompasses 3,572.49 acres.¹ Jersey Island is one of the eight western Delta Islands identified by Senate Bill 34, March 1988 that would pose a threat to the State's drinking water supply if permanently flooded. Jersey Island is located in unincorporated Contra Costa County and with the exception of a 57-acre parcel, is owned by

¹ Supplement to the Operation and Maintenance Assessments Roll, August 2006, Bartle Wells Associates, p. 1.

Ironhouse Sanitary District ("ISD"). Under separate cover, ISD will be submitting its own letter in response to the NOP.

In order to fund the operation and maintenance of the Jersey Island reclamation works, the RD 830 Board of Trustees on December 17, 1996 requested the Board of Supervisors of Contra Costa County to appoint three commissioners to prepare an assessment report and the operation and maintenance (O&M) assessment roll in accordance with Water Code Section 51324. In June 1998, the Assessment Valuation Commissioners prepared an assessment report and operation and maintenance valuation assessment roll for RD 830 which was adopted by the Board of Trustees.

In 2006, the Trustee retained Bartle Wells Associates, Independent Public Finance Advisors, to update the 1998 assessment roll and prepare the enclosed Supplement to the Operation and Maintenance Assessments Roll, hereinafter "Supplement," which was adopted by the Board of Trustees in August 2006. The Supplement presents assessment valuations for each parcel subject to RD 830 O&M assessment and for this purpose categorizes lands on Jersey Island according to the following use categories:

- Agriculture,
- Electric utility easement,
- Gas utility easement,
- Gas wells,
- Public roads, and
- Ferry Slip.

Subsequent to the preparation of the Supplement, ISD installed a pipeline on Jersey Island for the conveyance of wastewater from its treatment plant located on the mainland to its outfall point into the San Joaquin River on the north coast of Jersey Island. This pipeline is shown in Figure 2-3 of the Final Supplemental Environmental Impact Report (FSEIR),² which analyzes the impacts of the new wastewater treatment plant,. Accordingly, this letter adds the following land use category to the above list:

² Draft Supplemental Environmental Impact Report for Ironhouse Sanitary District Wastewater Treatment Plant Expansion, SCH No. 2004082025, certified by the ISD Board by Resolution No. 07-02, January 16, 2007.

- Wastewater Pipeline.

The above land use categories are used below to identify the impacts which RD 830 requests be analyzed by the Draft EIR. First, I would like to briefly comment on the relationship of RD 830 to the Delta Plan.

RD 830 and its Relation to the Delta Plan

As you know, Jersey Island is located within the Primary Planning Area for the Delta Plan, as shown on Figure 1, page 12 of the NOP. RD 830 has an understandably keen and significant interest in the future of the Sacramento-San Joaquin Delta and supports the preparation of the Delta Plan. As noted at page 4 of the NOP:

“..... the Department of Water Resources [has] completed several studies that identified a higher risk of Delta levee failure due to earthquakes than was previously understood, and that the levee failures would place public lives and Delta property at risk, interruption of reliable water supplies, reduce water quality of Delta water supplies, and possibly degrade ecosystems. The studies also described potential adverse effects to levee integrity, water quality, and water supplies that would be caused by **up to 55-inches of sea level rise that could occur by 2100.**” (Emphasis added.)

RD 830 understands and appreciates the gravity of this situation and the urgent need for the Delta Plan. RD 830, through the submission of these comments in response to the NOP, intends to focus the attention of the Delta Stewardship Council and the Delta Plan on the circumstances unique to Jersey Island. To this end, RD 830 requests that the Draft EIR analyze the Delta Plan from the perspective of its potential impacts, both positive and negative, on RD 830's ability to continue to protect the several infrastructure facilities maintained by the multiple land owners and easement holders on Jersey Island.

Impacts on Infrastructure Facilities.

In order to analyze the potential impacts of the Delta Plan on the infrastructure facilities located on Jersey Island, this section of the letter briefly describes each land use based on materials extracted from the previously cited Supplement.

Wastewater Pipelines

Currently, ISD's wastewater treatment facilities located on its mainland property is connected to an outfall in the San Joaquin River as follows. One 24-inch pipeline has been installed running from ISD's treatment facilities on the mainland across Marsh Creek, and across Dutch Slough to Jersey Island; thence along Jersey Island Road to the north end of Jersey Island. In the future, a second 24-inch pipeline may be installed along a similar route as mentioned above. Ultimately, both pipes would converge into the single 30-inch-diameter pipeline near the levee on the north shore of Jersey Island that would discharge tertiary treated, ultraviolet light disinfected effluent into the San Joaquin River in the vicinity of the existing Jersey Island dewatering pump station. Operation and maintenance of the wastewater pipelines would be significantly impaired if dry land access to them were not available. This dry land access is made possible by the reclamation works operated and maintained by RD 830.

Agriculture

ISD manages its lands on Jersey Island as an integral part of its wastewater treatment process. ISD applies some of its treated wastewater to 450 acres of these lands to produce irrigated pasture and forage crops consumed by the approximately 2,000 head Jersey Island cattle herd which ISD manages as a cow/calf operation. In this manner, the pasture and forage crops produced by the treatment process absorb some of the nutrients present in the treated wastewater and are disposed of biologically rather than by mechanical means. Forage not consumed by the cattle herd is sold commercially. Revenue from the sales of the cattle and forage crops offset ISD's cost of operations, thereby in some measure reducing the service charge paid by ISD rate payers. The Jersey Island reclamation works operated and maintained by RD 830 make this use of Jersey for agriculture possible.

Electric Utility Easements

As shown in Exhibit No. 830-5, Utility Easements - Overhead of the Supplement, the Western Area Power Administration (WAPA) maintains high tower power transmission lines on right of way easements 200 feet in width across twelve (12) parcels on Jersey Island. As also shown in this Exhibit, Pacific Gas and Electric Company (PG&E) maintains high tower power transmission lines on right of way easements 650 to 800 feet in width across ten (10) parcels located on Jersey Island. PG&E also retains an easement for pole lines providing electrical service to Bethel Island.

Access for maintenance of these transmission lines is much easier and faster by vehicle over roads and dry land. If Jersey Island were flooded and remained inundated, access to the high towers could be obtained by boat, but considerable time and effort would be required by this means of access. Floating equipment would be required at a greater expense and at a greater safety risk to personnel. RD 830 provides a service to the owners of the utility easements by providing land access. This service consists of drainage pumping and routine levee maintenance. Drainage consists of power, pump repair and maintenance and canal cleaning costs associated with maintaining Jersey Island in a dry condition, free from water due to rainfall, irrigation runoff and seepage.

Gas Utility Easements

As shown in Exhibit No. 830-6, Utility Easements - Underground contained in the Supplement, Jersey Island is traversed by buried gas pipelines owned by PG&E, ABA Energy Corporation, Venoco, ConocoPhillips, and Calpine. RD 830 benefits the owners of the gas utility easements by providing land access over the levee and land for continuous maintenance and operation of the buried facilities as well as any valves, meters, or other above ground facilities used in the operation of the buried utility lines. In the event of a levee break at or near where the buried utility lines pass through or under the levee, the utility lines could be exposed to such an extent that a failure of the utility pipeline could occur.

Gas wells

As shown in Exhibit No. 830-6, Utility Easements - Underground contained in the Supplement, Jersey Island is the location of several gas wells which produce the Dutch Slough natural gas field. If Jersey Island were flooded and remained inundated, the costs of operating and maintaining these gas wells would be considerably greater. The existing gas wells would require extensive modification. Platforms would have to be constructed with new equipment above the water surface of the flooded area. RD 830 benefits the owners of these gas wells by operating and maintaining the reclamation works which allow access over the land for continuous operation and maintenance of the gas wells.

Public Roads

As shown in Exhibit No. 830-4, Ownership and Parcel Map, contained in the Supplement, Contra Costa County owns and maintains the Jersey Island Road from the Jersey Island Bridge over Dutch Slough to the pump station at the San Joaquin River. The Ferry Road branches off of Jersey Island Road and runs to the ferry slip owned and operated by the Delta Ferry Authority. Jersey Island Road, the Ferry Road and the Jersey Island Ferry provide the landowners on Bradford Island and Webb Tract with their only access to the mainland of Contra Costa County. This same access is also used by Contra Costa County law enforcement and fire protection for access to Bradford Island and Webb Tract.

Ferry Slip.

The Delta Ferry Authority retains a Grant of Easement for a small 0.17 acre parcel at the northeast tip of Jersey Island which is used for the ferry slip. As noted previously, Jersey Island Road, the Ferry Road and the Jersey Island Ferry provide the landowners on Bradford Island and Webb Tract with their only access to the mainland of Contra Costa County.

Conclusion

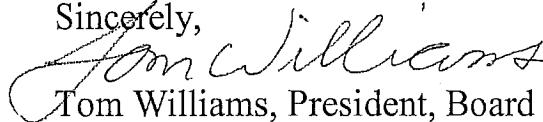
As noted at the beginning of this letter, page 4 of the NOP highlights:

- (1) The risk of Delta levee failure due to earthquakes, and
- (2) The potential adverse effects to levee integrity, water quality, and water supplies that would be caused by up to 55-inches of sea level rise that could occur by 2100.

As described above in this letter, RD 830 plays a critical in the Delta. The Draft EIR for the Delta Plan which is under preparation by the Delta Stewardship Council must analyze these two impacts as they potentially affect Jersey Island's reclamation works and the several infrastructure facilities which are protected and made accessible by these works.

In closing, thank you for sending RD 830 the NOP and we look forward to the opportunity to comment on the Draft EIR and its analysis of these issues of great importance to the Delta Plan and to the future of California.

Sincerely,



Tom Williams, President, Board of Trustees

Cc: ISD Board of Directors
RD 830 Board of Trustees and General Counsel

Encl: Supplement to the Operation and Maintenance Assessments Roll,
Bartle Wells Associates, Independent Public Finance Advisors, 2006.